

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket Nos. 360, 361, 605 & 606

**NOTICE OF FILING OF BLACKLINE OF (A) AMENDED JOINT CHAPTER 11 PLAN  
OF LORDSTOWN MOTORS CORP. AND ITS AFFILIATED DEBTORS; AND  
(B) AMENDED DISCLOSURE STATEMENT PURSUANT TO 11 U.S.C. § 1125  
WITH RESPECT TO JOINT CHAPTER 11 PLAN OF  
LORDSTOWN MOTORS CORP. AND ITS AFFILIATED DEBTORS**

**PLEASE TAKE NOTICE** that, on September 1, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 360] (the “**Joint Chapter 11 Plan**”) with the Court.

**PLEASE TAKE FURTHER NOTICE** that, on September 1, 2023, the Debtors filed the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 361] (the “**Disclosure Statement**”) with the Court.

**PLEASE TAKE FURTHER NOTICE** that, contemporaneously herewith, the Debtors have filed the *Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 605] (the “**Amended Joint Chapter 11 Plan**”).

**PLEASE TAKE FURTHER NOTICE**, that contemporaneously herewith, the Debtors have filed the *Amended Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint*

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

*Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 606] (the “**Amended Disclosure Statement**”).

**PLEASE TAKE FURTHER NOTICE** that for the convenience of the Court and all parties in interest, a blackline of the Amended Joint Chapter 11 Plan against the Joint Chapter 11 Plan is attached hereto as **Exhibit 1**, and a blackline of the Amended Disclosure Statement against the Disclosure Statement is attached hereto as **Exhibit 2**.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 24, 2023  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u>  <b>WOMBLE BOND DICKINSON (US) LLP</b>  Donald J. Detweiler (DE Bar No. 3087)  Morgan L. Patterson (DE Bar No. 5388)  1313 North Market Street, Suite 1200  Wilmington, Delaware 19801  Telephone: (302) 252-4320  Facsimile: (302) 252-4330  don.detweiler@wbd-us.com  morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b>  Thomas E Lauria (admitted <i>pro hac vice</i>)  Matthew C. Brown (admitted <i>pro hac vice</i>)  Fan B. He (admitted <i>pro hac vice</i>)  200 South Biscayne Boulevard, Suite 4900  Miami, FL 33131  Telephone: (305) 371-2700  tlauria@whitecase.com  mbrown@whitecase.com  fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)  1221 Avenue of the Americas  New York, NY 10020  Telephone: (212) 819-8200  david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)  111 South Wacker Drive, Suite 5100  Chicago, IL 60606  Telephone: (312) 881-5400  jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>)  Doah Kim (admitted <i>pro hac vice</i>)  RJ Szuba (admitted <i>pro hac vice</i>)  555 South Flower Street, Suite 2700  Los Angeles, CA 90071  Telephone: (213) 620-7700  rkampfner@whitecase.com  doah.kim@whitecase.com  rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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